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December 22, 2021

VIA ECF

Honorable Paul Engelmayer
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 1305
New York, NY 10007

Re: *Black v. Ganieva, et al.*
Docket No.: 1:21-cv-08824-PAE

Dear Judge Engelmayer:

We represent Wigdor LLP (“Defendant” or “Wigdor”) in the above-referenced matter. We write, with consent of all parties, to request an enlargement of the page limits for: (i) Wigdor’s memorandum of law in support of its anticipated motion to dismiss, from twenty-five (25) pages to thirty-five (35) pages; and (ii) Wigdor’s reply memorandum in further support of its motion to dismiss, from ten (10) to fifteen (15) pages.

This request is made for good cause. Together with exhibits, Plaintiff Leon Black’s (“Black”) 336 page complaint alleges that Wigdor, a law firm, was purportedly involved in a RICO conspiracy with its client, and that it extorted and defamed Black. These allegations raise particularly complex legal issues. Specifically, not only does Wigdor need to address Black’s allegations under the usual Fed R. Civ. P.12(b)(1) and 12(b)(6) standards, but Wigdor also needs to address the various specific legal issues that arise when these kinds of allegations are levied against a law firm in the context of its representation of a client, and the complex legal issues that accompany civil RICO claims. Accordingly, Wigdor – with the consent of all parties – requests these additional pages to adequately address Black’s claims.

We appreciate the Court’s attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP
Attorneys for Wigdor LLP
/s/ Max Gershenoff /s/ Janice DiGennaro
Max Gershenoff Janice J. DiGennaro

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cc: All counsel via ECF